(After ODOT's Hazardous Waste QAR Action Plan)

Non-compliance area to be addressed	Action steps to be taken
EPA ID Number	To apply for or modify an EPA ID number complete and submit the form found on EPA web site at http://www.epa.state.oh.us/dhwm/notiform.html To Deactivate and ID number, notify Ohio EPA in writing on letterhead asking to deactivate the ID number
Generator Status	The facility must be able to identify the correct generator status based on the month to month generation of hazardous waste. Large Quantity Generator (LQG) is a facility that generates more that 2,200 pounds of hazardous waste in a month. Small Quantity Generator (SQG) is a facility that generates more that 220 but less than 2,200 pounds of hazardous waste in a month. Conditionally Exempt Small Quantity Generator (CESQG) is a facility that generates less than 220 pounds of hazardous waste in a month.
Waste Evaluations	Disposal of the waste is based on the waste evaluations.
Aggregates	**Waste aggregate** that comes in contact with the TCE during the laboratory testing must be evaluated to determine if it is a hazardous waste for TCE. Retain and file all test results. The waste should be collected in an appropriate container that is labeled with the words identifying the contents.
Spent Aerosol Cans	Aerosol cans, which can not be emptied through normal use, will be collected in a drum which is labeled as Hazardous Waste. If the equipment is available, the cans should be punctured and the contents will be collected and evaluated. Retain and file all test results. This can be done by reviewing the MSDS sheets to determine if any of the aerosol cans of solvents that are used in the shop contain a listed hazardous waste. You need to look at both the propellant and the solvent to make this determination. Empty punctured cans should be recycled as scrap steel.
Anti Freeze	Prior to the drum becoming full, make arrangements to have the contents of the containers tested and disposed of properly. The spent antifreeze should be analyzed for TCLP VOC's, lead, cadmium and chromium. Retain and file all test results. Used antifreeze must be collected/captured in approved containers. Label the container as "Used Antifreeze only." Do not put any other material in the drums. Before putting any used antifreeze in the drum, label the drum so it can be read easily from more then one direction. Place the drum in a safe, easily accessible location, where it will not be bumped, punctured, run over, etc. (Don't place these drums near sewers or floor drains. Have some sort of emergency containment material/device at, or near the location, in the event of a spill) If it is recycled as a product, it is not regulated as a hazardous waste. However, if it is hazardous, it would need to be managed as a hazardous waste prior to recycling.
Ballast from Fluorescent Lamp Fixtures	Spent ballast should be evaluated for TCLP mercury and PCB's. Retain and file all test results. The spent ballast should be recycled. A list of recyclers can be found on Ohio EPA's web page at: http://www.epa.state.oh.us/dhwm/guidancedocs.html#recycle
Sand Blasting Sands	Spent blasting sand must be evaluated for total lead, cadmium and chromium. The blasting sands are disposed of as a hazardous waste or a solid waste in accordance with test findings. Retain and file all test results.

Waste Evaluations	The disposal of the waste is based on the waste evaluations.
Fuel Filters	The spent fuel filters must be analyzed for benzene and flashpoint if they are sent off site for disposal. Retain and file all test results. **However**, because the regulatory level for benzene is 0.5 mg/L, it is more cost effective to recycle the used fuel filters. IF RECYCLED: The used fuel filters, if thoroughly drained, may be combined with the used oil filters as a scrap metal. The recycled spent fuel filters would not be regulated as a hazardous waste.
Lead Weights	Lead Weights will be recycled at each location and will be stored in approved, labeled containers. The weights can be sold as scrap metal for recycling. As a recyclable material, these lead weights would not be regulated as a hazardous waste.
Metal Turnings	Metal turnings can be sold with scrap metal for recycling if there are no cutting oils dripping from them. If recycled, the metal turnings would not be regulated as a hazardous waste. The District should fill a steel drum with the metal turnings, and keep that drum in the machine shop. The drum of turnings can then be placed into the scrap metal bin on the day that it is picked up. Collect as much of the cutting oil as possible and manage as used oil. This will prevent any cutting oils from seeping out of the scrap metal bin.
Oil Water Separators Oils	The District will test oils in the oil water separator for VOC's, total halogens, a totals analysis for lead, cadmium and chromium, and flashpoint. The oil may be managed as used oil (see below). Retain and file all test results.
Oil Water Separators Sludge	The district will test the sludge in the oil water separator for TCLP VOC's, lead, cadmium and chromium, and flashpoint. The sludge will be disposed according to the test findings. Retain and file all test results.
Printed Circuit Boards	This spent printed circuit boards should be analyzed for TCLP metals. Retain and file all test results. The spent printed circuit boards shall be collected evaluated and placed into the appropriate container. If recycled, the printed circuit boards would not be regulated as a hazardous waste.
Paint Filters	The District should determine if they are hazardous waste. If the only material getting into the filters is the overspray paint, then the filters may be a characteristic waste. This evaluation can be done by reviewing the MSDS sheets to determine if any of the paints contains any of the toxic characteristic constituents and test for these. DO NOT SPRAY THE CLEANING SOLVENT INTO THE FILTERS – THIS MAY CAUSE THE FILTERS TO BE A LISTED HAZARDOUS WASTE DEPENDING ON THE SOLVENT USED. The filters will be disposed according to the test findings. Retain and file all test results.
Paint Waste / Solvent	Waste products from paint shops are evaluated to determine if they are hazardous and are disposed of using appropriate methods. This evaluation can be done by reviewing the MSDS sheets to determine if any of the paints are a characteristic hazardous waste and test for these. If the solvents used are F-listed solvents, the waste needs to be managed using the appropriate F-code. Retain and file your evaluation documentation (MSDS and test results). If the unused paint is a non hazardous waste, it should be mixed with oil dry and sent to a solid waste landfill with their approval. If you are unable to make a determination on these wastes, then the paint/solvents should be analyzed for VOC's, metals and flashpoint. The spent paint/solvent waste will be collected in an appropriate container that is labeled with the appropriate words. It is not to be sprayed into the filters.

	The spent solvent/paint could be recycled and reused for cleaning on site. However, it would need to be managed as a hazardous waste prior to recycling.
Waste Evaluations	The disposal of the waste is based on the waste evaluations.
Solvent Contaminated Paper Towels	Paper towels must be evaluated to determine proper disposal methods. File the evaluation results. The facility must make a list of the solvents used in the garage and then assign the proper hazardous waste code to the manifest. Solvent contaminated paper towels are to be collected in separate appropriate labeled containers.
Street Sweeping Wastes	Street sweeping waste should be tested. This waste should be analyzed for TCLP VOC, SVOC, and metals. Retain and file all test results. If stored on-site, store away from any storm water runoff. If possible, and appropriate, it should be taken directly to a landfill. Dispose of the material appropriately as defined by the test results.
Tar Truck Spray Bar Cleaning	The waste collected from cleaning the spray bar on the tar truck should be analyzed for TCLP VOC, SVOC, flashpoint and metals. Retain and file all test results. The waste will be collected in an appropriate container that is labeled as a hazardous or non hazardous waste based on the analysis.
Used Oil	The used oil should be analyzed for total halogens, a totals analysis for arsenic, lead, cadmium and chromium, and flashpoint. Retain and file all test results. The used oil will be collected in an appropriate container labeled with the words "Used Oil". File and retain all shipping papers.
Used Oil Contaminated Floor Dry	Spent oil dry is to be collected in separate appropriate labeled containers. The District will apply the used oil evaluation to determine proper disposal methods. Retain and file all test results.
Used Oil Contaminated Paper Towels	Paper towels are to be collected in separate, appropriately labeled containers, from other paper towels and debris. The District will apply the used oil evaluation to determine proper disposal methods. Retain and file all test results.
Unknown Containers in a Facility (this is not for containers found along the road)	The contents of unknown containers should be analyzed for TCLP VOC's, metals, Semi Volatile Organic Compounds (SVOC), flashpoint, and pH. Retain and file all test results. The facility should prevent the accumulation of unknowns by requiring every container to be labeled. After the test results are received, the containers disposed of properly. File disposal manifest.
Universal Waste	
Batteries	All spent batteries should be placed in a container that is capable of containing any leaks. This container should be labeled as "Universal Waste - Batteries." Batteries can be sent off site for recycling. An accumulation date should be placed on the container when the first battery is placed in it. This will document how long the batteries have been on site.
Bulbs	All spent fluorescent bulbs will be placed back into their original container that is kept closed. This container will be labeled as "Universal Waste - Bulbs" and the accumulation date will be placed on the container. These bulbs should be sent off site for recycling.

Manifest and Other Documentation	
Annual Reports	If the facility generates more than 2,200 pounds of hazardous waste in any single month, then the facility must submit an annual report to the Ohio EPA. Annual report information can be found at http://www.epa.state.oh.us/dhwm/ann_report.html
Manifest System and Record Keeping	Each waste stream shall have its own file section. The waste analysis for each waste stream shall be placed in that file. The LDR paperwork shall be placed in that file for each waste stream, the underlying hazardous waste constituent paperwork shall be placed into that file. All of the manifests for that waste stream shall be filed in order by date. The generator's copy of the manifest, which is signed by the transporter, must be attached to the copy that is returned and signed by the disposal facility. Manifests for hazardous waste, used oil and any other non-hazardous waste that are sent off-site must be kept for three years.
Used Oil Recycled Off Site	It must be picked up by a transporter that has an EPA ID number. The receipt should say that the used oil is going to be recycled. The recycling receipt must be kept for 3 years. If used oil is transported between District Garages, then some form of documentation must be created and kept for 3 years.
Used Oil Burned in a Space Heater	Document that the used oil was generated on-site or was only from household do-it- yourself generators. Document the heater is designed to have a maximum capacity of not more than 0.5 million Btu per hour. Vent combustion gases to the outdoors. Have appropriate air pollution control permits, if required. Retain these records.
Container Management	For LQGs and SQGs
Accumulating Hazardous Waste	The date when each period of accumulation begins must be clearly marked and visible for inspection on each container. While being accumulated on-site, each container and tank is labeled or marked clearly with the words "Hazardous Waste",
Closed Containers	All containers of hazardous waste will be kept closed except when adding or removing the hazardous waste.
Compatible Waste	The facility must use a container made of or lined with materials which will not react with and are compatible with, the hazardous waste stored in the container.
Disposal Times	LQG's may store hazardous waste for up to 90 days. SQG's may store hazardous waste for up to 180 days. CESQG's may store hazardous waste without a time limit up to the point where they have accumulated 2,200 pounds of hazardous waste. Then the SQG time frame applies.
Physical Condition	If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the facility must transfer the hazardous waste from such container to a container that is in good condition.
Handling	Personnel will be trained on how to opened, handled or store a container holding hazardous waste. The training will demonstrate how not to cause the container to rupture or leak.

Container Management	
Labeling	All containers will be properly labeled before any products are placed into the container.
Ignitable Waste	The storage of an ignitable waste must be at least 50 feet from the facility property line. (LQGs ONLY)
Aisle Space	The facility shall maintain aisle space to allow the unobstructed movement of personnel, and emergency equipment in the hazardous waste storage area.
Security	Each facility will ensure that the hazardous waste is stored in a secure storage area.
Used Oil Containers	Containers and aboveground tanks used to store used oil at a facility, must be labeled or marked clearly with the words "Used Oil." Fill pipes used to transfer used oil into underground storage tanks at a facility must be labeled or marked clearly with the words "Used Oil."
Weekly Inspections	SQG's and LQG's must conduct and document weekly inspections of the hazardous waste storage areas. An example check lists can be found at http://www.epa.state.oh.us/dhwm/pdf/sqglog.PDF for SQGs and http://www.epa.state.oh.us/dhwm/pdf/lqglog.PDF for LQGs. Completed checklists are to be filed on site.
Shipping Requirements	
Transporter Placards	Each facility may acquire the proper transporter placards but must ensure that the transporter is properly placarded before it leaves the facility. In accordance with the regulations for hazardous materials under 49 CFR Part 172, Subpart F.
US DOT Labeling Requirements	Prior to transport each facility will ensure that the proper DOT shipping labels are on the container in accordance regulations on packaging, under 49 CFR Parts 173, 178 and 179.
US DOT Marking Requirements	Before offering hazardous wastes for transportation off-site, the facility will mark each container of one hundred ten (110) gallons or less with the following words and information displayed in accordance with the requirements of 49 CFR 172.304 "Hazardous waste - Federal law prohibits improper disposal. If found, contact the nearest police or public safety authority, or the United States Environmental Protection Agency. Generator's name and address_____ Manifest document number _____." **Effective: 10/20/98**
US DOT Packaging Requirements	Prior to transport, each facility will ensure that the proper DOT container has been used in accordance with the applicable United States Department of Transportation regulations on hazardous materials under 49 CFR Part 172.
Emergency Response	
Emergency Response Plan	The plan shall identify the location of fire extinguishers, spill control material, and fire alarms. These items shall be included on a facility site map that shall be a part of the Emergency Response Plan. The map shall also include evacuation routes out of the buildings and identify tornado shelters. The plan shall also list the telephone number of the fire department. The Emergency Response Plan shall include information on how to respond to a fire, explosion, or other release which could threaten human health outside the facility or when the facility has knowledge that a spill has reached surface water. The facility must immediately notify the National Response Center [using their twenty-four-hour toll free number: (800) 424-8802], and the Ohio EPA at (800) 282-9378. This report must include the following information: The name, address, and U.S. EPA identification number of the facility; date, time, and type of incident (e.g., spill or fire); quantity and type of hazardous waste involved in the incident; extent of injuries, if any; and estimated quantity and disposition of recovered materials, if any.
Emergency Communication	The facility shall ensure that employees have immediate access to a telephone, mobile radio or hand-held two-way radio available at the hazardous waste storage area. This equipment must be capable of summoning external emergency assistance.
Emergency Information SQG's Only	The district office must post the following information next to the telephone near the hazardous waste storage area: (i) The name and telephone number of the emergency coordinator; (ii) Location of fire extinguishers and spill control material, and, if present, fire alarm(s); and (iii) The telephone number of the fire department.

Emergency Response	
Spills of Used Oil and Other Waste Products	**Spills** of used oil and other waste or products shall be cleaned up as soon as possible. When using floor dry to contain and adsorb a spill, it shall not be allowed to remain on the floor any longer than it is necessary to adsorb the spilled material.
Spill Kits	Areas, including all hazardous waste areas, where spill are likely to occur must have a spill kit. A spill kit can consist of a bag of oil dry in a drum with a shovel or broom if appropriate for the waste. If the facility is an LQG, the spill kit(s) need to be listed in the contingency plan and the equipment should match what is listed in the plan.
Contingency Plan	The facilities that are LQG's need to have a written contingency plan with the most current list of emergency coordinators. An example contingency plan can be found under "Generator Requirements" at http://www.epa.state.oh.us/dhwm/guidancedocs.html#generator
No Smoking Signs	The area where ignitable hazardous waste and/or products are stored must have a "No Smoking" sign posted at the entrance.
Personal Protective Equipment	Facilities which manage hazardous waste should have the proper personal protective equipment available to respond to a spill.
Emergency Equipment Inspections	The facility will conduct and record inspections of the communication or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment. The emergency equipment shall be tested and maintained quarterly to assure its proper operation in time of emergency. File the recorded inspections.
Training for the Handling Hazardous Waste	Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility is compliance with hazardous waste regulations. Facility personnel will be trained to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems. LQGs need written documentation of the training program as well as job titles and descriptions. An example of job titles as descriptions can be found under "Generator Requirements" at http://www.epa.state.oh.us/dhwm/guidancedocs.html#generator
Product Storage	
Covers	
Cold Patch	The cold patch will be covered to prevent the leaching of contaminants onto the soils.
Dumpsters of Solid Waste	Dumpsters with lids or tarps should be provided by the contract vendor. Dumpsters with lids or tarps will be kept closed or covered.
Dumpsters of Scrap Tires	Dumpsters with lids or tarps should be provided by the contract vendor. Dumpsters with lids or tarps will be kept closed or covered.
Pressure Treated Lumber	The pressure treated lumber will be covered to prevent the leaching of contaminants onto the soils.
Waste Water Run Off Issues	
Calcium Chloride	Calcium Chloride Spills procedures should be added to each of the facilities Emergency Response Plan. Calcium chloride must not be discharged from the storage tank to reduce inventory.
Salt Water Runoff	Salt bins, barns, and domes will not be over filled exposing the salt to the snow or rain. Other measures such as tarps or the installation of doors on the front of each of our salt domes will be reviewed and implemented as needed. After daily loading and unloading operations, the areas will be cleaned up and all excess salt will be placed back into the building.
Salt Brine Runoff	Salt Brine Spills procedures will be added to each of the facilities Emergency Response Plan. Salt brine must not be discharged from the storage tank to reduce inventory.
Truck Wash Water	The washing of trucks and vehicles shall take place in the area designated for the washing of vehicles. Wash water must be captured and properly treated.

Air Permits	
Paint Booths	The facility will determine if it has emissions unit(s) that are not exempt from a Permit to Install requirement. Only de minimis unit(s) are exempt. A de minimis unit is one that could emit 10 pounds or less of any criteria pollutant per 24-hour period. The facility needs to document the reasons that they are an exempt facility. File all forms.
Sand Blasting Booths	The facility will determine if it has emissions unit(s) that are not exempt from a Permit to Install requirement. Only de minimis unit(s) are exempt. A de minimis unit is one that could emit 10 pounds or less of any criteria pollutant per 24-hour period. The facility needs to document the reasons that they are an exempt facility. File all forms.